



"Bounds, Julie"  
<Julie.Bounds@ATK.C  
OM>

06/26/03 07:58 AM

To: Margaret Sheppard/DC/USEPA/US@EPA  
cc: "Beck, Denise" <Denise.Beck@ATK.COM>, "Hawk, Steven"  
<Steven.Hawk@ATK.COM>  
Subject: FW: 1-Bromopropane

Margaret,  
Thank you very much for sending the summary of our phone conversation. We agree with your summary of the conversation. The SNAP application was easy to find on the website and we plan to submit it early next week.  
Thank you again for all your assistance with this issue.  
Julie Bounds

-----Original Message-----

From: Beck, Denise  
Sent: Wednesday, June 25, 2003 5:03 PM  
To: Bounds, Julie  
Subject: FW: 1-Bromopropane

-----Original Message-----

From: Sheppard.Margaret@epamail.epa.gov  
[mailto:Sheppard.Margaret@epamail.epa.gov]  
Sent: Wednesday, June 25, 2003 2:37 PM  
To: Beck, Denise; Hawk, Steven  
Cc: tierney.jan@epamail.epa.gov  
Subject: 1-Bromopropane

Denise and Steve,  
Here is a draft summary of our conference call. I wanted to be certain that we are on the same page.

Steve Hawk, Greg Busek, Julie Bounds, Denise Beck--Lake City Army  
Munition Plant  
Margaret Sheppard, EPA

June 25, 2003 Followup conversation about use of nPB as carrier solvent in sealant for small ammunition

Must the plant live with 10,000 lbs/yr? No.

Since previous call with Julie Bounds, Tom Hermon, and Denise Beck, Margaret checked with legal counsel?the limitation is on the sale of nPB before a submission is made. The plant may use nPB before the submission is made. Once a SNAP submission is made, there is not a limit on the amount that may be used or sold in the end use. The 10,000 lbs/yr applies to minimal amount sold in an industrial sector?not an end use--before notification to EPA is required. [MS: So, the 10,000 lbs would have to be for entire adhesives, coatings, and inks sector, rather than just this use.]

Suppliers may also provide notification of test marketing, if they are not yet selling into interstate commerce.

Ms. Sheppard suggested making a submission to the SNAP program. She said that there was sufficient information on the environmental and toxicological impacts, and that a submission could refer to the proposed rule for those pieces of information. The critical information that is missing is 1) exposure data and 2) market data for the coatings end use.

After some discussion, it was agreed that it would be sufficient to provide exposure data and the amount of nPB used, and future volume, in this particular application. If others are interested in other coatings applications for nPB, they would need to submit for those uses separately.

EPA could issue a final rule on nPB that would find nPB acceptable (use conditions consistent with other end uses) for this particular coatings application. The munitions plant should send a public comment, asking for EPA to include this particular application in the final rule. EPA would put both the comment and the submission in the public docket.

Julie Bounds requested feedback, if I find the submission incomplete. I said I usually do this within 2-4 weeks of receiving a submission. I would try to make sure I provide feedback before the end of the public comment period.

(Tel. 816-796-5193 for Julie Bounds)